

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

**Plaintiffs' Master Administrative Long
Form Complaint and:**

Charles E. Commiskey, ONLY
v. National Football League, *et al.*,
No. 12-cv-01423 (AB)

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR PLAINTIFF CHARLES E. COMMISKEY**

AND NOW come James R. Dugan, II, Douglas R. Plymale and David B. Franco of the Dugan Law Firm, APLC; Christopher A. Seeger and Jonathan Shub of Seeger Weiss, LLP; Allan Berger and Andrew J. Geiger of Allan Berger & Associates, PLC; and Norman F. Hodgins, III of Hodgins Law Group, LLC (collectively "Plaintiffs' counsel"), moving this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(a)(3) and Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Charles E. Commiskey ONLY in this action, and state as follows.

1. Plaintiffs' counsel filed the action *Hughes, et al. v. National Football League, et al.*, 2:12-cv-01423-AB, in the United States District Court of Eastern District of Louisiana on February 17, 2012, for the benefit of several retired National Football League players, including Plaintiff Charles E. Commiskey.

2. On March 21, 2012, the *Hughes* case was transferred to the National Football League Players' Concussion Injury Litigation.

3. Plaintiffs' counsel filed a short form complaint for Plaintiff Charles E. Commiskey on July 16, 2012 [D.E. # 2625].

4. Charles Commiskey has discharged the undersigned counsel from representing him in this action.

WHEREFORE, undersigned counsel respectfully requests this Court for leave to withdraw as counsel for Charles E. Commiskey ONLY in this action.

Dated: August 19, 2014

Respectfully submitted:

s/ David B. Franco
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was served electronically via the Court's electronic filing system on the 19th day of August 2014, upon all counsel of record.

s/ David B. Franco
David B. Franco